

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	Case No. 6:22-cr-169-RAW
)	
DUSTIN KEITH DEATHERAGE,)	
)	
Defendant.)	

DEFENDANT'S MOTION TO CONTINUE

COMES NOW, Dustin Keith Deatherage (Defendant), by and through counsel, Blake E. Lynch of Wagner & Lynch, PLLC, and files this *Motion to Continue*. In support of said Motion, Defendant would show the Court:

1. The above styled case is set for Sentencing on March 27, 2024, at 10:00 a.m.
2. That on March 4th, 2024, the Counsel for the Defendant began a two-week trial in Pittsburg County which prevented Counsel from meeting with the Defendant to further discuss the Sentence.
3. Counsel for Defendant asks the court to continue the Sentencing date and allow time to finalize plea negotiations and to properly advise the Defendant.
4. Counsel has attempted to confer this matter with the Government through Assistant United States Attorney, Joshua Satter on March 26th, 2024, by phone and email and have not yet received a response.

5. This continuance is not requested for undue delay, but rather to ensure judicial economy and serve the interest of justice.

WHEREFORE, premises considered, Defendant, Dustin Keith Deatherage, prays that in the above-styled and numbered cause, the Court grant his *Motion to Continue*.

s/Blake E. Lynch

Blake E. Lynch, OBA #22634
ATTORNEY FOR DEFENDANT,
Troy Michael Goforth
WAGNER & LYNCH, PLLC
109 E. Washington Avenue
McAlester, OK 74501
Phone: (918) 421-8843
Facsimile: (918) 421-8853
blake@wagnerandlynch.com

CERTIFICATE OF CONFERENCE

I, Blake E. Lynch, hereby certify that before filing of this motion I conferred with the attorney for the Government, Joshua Satter, Assistant United States Attorney. The Government does not object to Defendant's Motion to Continue.

s/Blake E. Lynch

Blake E. Lynch

CERTIFICATE OF SERVICE

I, Blake E. Lynch, hereby certify that on March 25, 2024, I electronically filed the foregoing with the Clerk of the Court for the Eastern District of Oklahoma by using the CM/ECF document filing system which will send a notice of electronic filing to each counsel of record in this case.

I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to the following non-CM/ECF participants: None.

s/Blake E. Lynch

Blake E. Lynch